

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA GONZÁLEZ, FREDDY JOSE ARAPE RIVAS, M.H., CECILIA DANIELA GONZÁLEZ HERRERA, ALBA CECILIA PURICA HERNÁNDEZ, E.R., HENDRINA VIVAS CASTILLO, A.C.A., SHERIKA BLANC, VILES DORSAINVIL, and G.S..

Plaintiffs.

VS.

KRISTI NOEM, in her official capacity as Secretary of Homeland Security, UNITED STATES DEPARTMENT OF HOMELAND SECURITY, and UNITED STATES OF AMERICA

Defendants

Case No. 3:25-cv-01766-EMC

**DECLARATION OF C.B. IN SUPPORT OF
PLAINTIFFS' MOTION FOR
COMPLIANCE WITH COURT ORDER**

Additional Counsel for Plaintiffs

1 Jessica Karp Bansal (SBN 277347)
jessica@ndlön.org
2 Lauren Michel Wilfong (*Pro Hac Vice*)
lwilfong@ndlön.org
3 NATIONAL DAY LABORER
ORGANIZING NETWORK
4 1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
5 Telephone: (626) 214-5689

6 Eva L. Bitran (SBN 302081)
ebitran@aclusocal.org
7 ACLU FOUNDATION
OF SOUTHERN CALIFORNIA
8 1313 West 8th Street
Los Angeles, CA 90017
9 Telephone: (213) 977-5236

10 Erik Crew (*Pro Hac Vice*)
ecrew@haitianbridge.org
11 HAITIAN BRIDGE ALLIANCE
4560 Alvarado Canyon Road, 1H
12 San Diego, CA 92120
13 Telephone: (949) 603-7411

DECLARATION OF C.B.

I, C.B., declare:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. If called as a witness, I would and could competently testify to the facts stated herein.
2. My partner, Jhonathan Rodriguez Godoy, is a TPS recipient under the 2023 designation for Venezuela. On April 11, 2025, Jhonathan re-registered for TPS under the January 17, 2025 extension for Venezuela.
3. On May 22, 2025, just days after the Supreme Court suspended TPS protections for TPS beneficiaries under Venezuela's 2023 designation, Jhonathan attended a required immigration hearing at the Immigration Court in San Antonio, Texas. Following that hearing, he was taken into custody by immigration agents who were waiting outside the courtroom.
4. Jhonathan has been detained since that time. I have been suffering greatly in his absence. I am constantly worried about him being deported to Venezuela, where he fears for his life, or even to a country that he has never been to before as I know that the government has been removing people to countries where they are not from. Meanwhile, I am struggling to support our household and to send money to Jhonathan's daughters and mother in Venezuela, who all rely on him for economic support. I am currently working three different jobs, seven days a week.
5. I speak with Jhonathan on the phone almost every day. Today, September 9, 2025, he attended a master calendar hearing. Even though I understand that Judge Chen's September 4, 2025, order restored the January 17, 2025 extension of TPS for Venezuela, Jhonathan is still detained. His immigration attorney told me that we had to wait for the USCIS website to be updated so we could seek his release.
6. Jhonathan told me that he is detained along with many other people from Venezuela. Some of them have already signed their voluntary departure orders. He said that, after Judge Chen's order came out, some of the men with TPS asked what would happen

1 with their cases. He told me that the ICE officers said something like “don’t get too
2 excited, you’re not getting out.”

3 I declare under penalty of perjury that the foregoing is true and correct, and that this
4 declaration was executed at , San Antonio, Texas, this 9th day of September, 2025.
5

6 /s/ C.B._____.

7 C.B.
8
9
10 CERTIFICATE OF INTERPRETATION

11 I, Emilia Garcia, certify that I am fluent in Spanish and English and that I am competent to
12 interpret between these languages. I further certify that I have read the foregoing to C.B. in
13 Spanish. I further declare that I am competent to render this interpretation and that I would
14 testify to the same under the penalty of perjury if I were called upon to do so.

15 Date: September 9, 2025



16 Emilia Garcia
17
18
19
20
21
22
23
24
25
26
27
28

1 CERTIFICATE OF SERVICE

2 I hereby certify that on September 9, 2025, I caused the foregoing to be electronically filed
3 with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing
4 (NEF) to all counsel of record.

5
6 ACLU FOUNDATION OF NORTHERN
7 CALIFORNIA
8 /s/ Emilou MacLean